



## Sunrise Farms, Inc.

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Dockets Management Branch ( HFA - 305)  
5630 Fishers Lane, Room 106 1  
Rockville, MD 20852

U.S. Food and Drug Administration

RE: Docket Nos. **99D** - 4488 and 99D - 4489

To Whom It May Concern:

**After** attending the NCFS in Chicago **in** November there have been some additional concerns I have in the recommended guidelines regarding the inclusion of mung bean sprouts as part of the protocol.

The report **from** the CDC given by Kammy Johnson shows that mung bean sprouts were involved in only 2 incidences **since** 1988. Furthermore, one of those incidences was listed as alfalfa and mung bean, which indicates that it could have been an issue of cross contamination **from** the alfalfa. This would bring it down to one incident involving mung bean since 1988. While no pathogenic outbreak should be taken lightly, I would not view this as a crisis problem. This incident could have come from a variety of circumstances, not necessarily seed. I suspect that the facility and SOP could very well have been the problem.

At the present time no scientific research has been done on sanitizing mung bean seed. We don't know if 2 ppm or 20,000 ppm is sufficient to kill pathogenic organisms. Furthermore we do not know the long term **health** risks involved in using these high levels of chlorine on a product that is consumed on a much larger scale than green leaf sprouts.

If protocol is going to be set for mung bean sprouts, more research must be done before any recommendations are set forth.

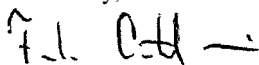
### Testing

If too much emphasis is placed on testing, it could give a very false sense security to those not doing things right as food processors. Testing is only a verification that the controls that are in place are effective. I believe that **HACCP** programs as well as **GMP's** and **SOP's** should play as big, if not the biggest part of sprout production, in conjunction with regular microbial testing (not necessarily each batch, but perhaps once per week). Step 1 in the **HACCP** plan should be the sanitizing of the seed, this would insure documentation that the process was implemented

While nothing is 100% in life, our goal is to take reasonable and practical steps to make these products safe. Just as it is not be **practical** for the meat industry to test every carcass that is processed, so too it **should** be the same for the sprouting industry.

Thank you in advance for any considerations.

Sincerely,

  
Frank Crikelair  
Sunrise Farms, Inc.

99D-4488  
• 99D-4489

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